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July 20, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie R. Salas, Esq.
Federal Communications Commission
Office of the Secretary
The Portals
445 12th St. S.W.
Room TWB 204
Washington, D.C. 20554

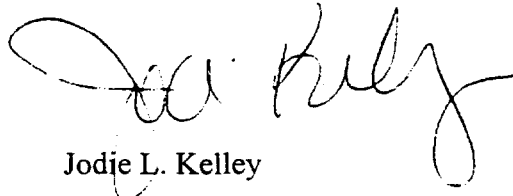
Re: CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed for filing please find an original and three copies of "WorldCom, Inc.'s Objections and Initial Responses to Verizon Virginia, Inc.'s Fifth Set of Discovery." An additional eight copies have been provided in a separate envelope to be delivered to the arbitrator. Finally, an extra copy is enclosed to be file-stamped and returned.

If you have any questions, please do not hesitate to call me at 202-639-6058. Thank you very much for your assistance with this matter.

Very truly yours,


Jodie L. Kelley

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Petition of WorldCom, Inc. Pursuant)
to Section 252(e)(5) of the)
Communications Act for Expedited)
Preemption of the Jurisdiction of the)
Virginia State Corporation Commission)
Regarding Interconnection Disputes)
with Verizon Virginia Inc., and for)
Expedited Arbitration)
)

CC Docket No. 00-218

In the Matter of)
Petition of Cox Virginia Telecom, Inc.)
Pursuant to Section 252(e)(5) of the)
Communications Act for Preemption)
of the Jurisdiction of the Virginia State)
Corporation Commission Regarding)
Interconnection Disputes with Verizon)
Virginia Inc. and for Arbitration)
)

CC Docket No. 00-249

In the Matter of)
Petition of AT&T Communications of)
Virginia Inc., Pursuant to Section 252(e)(5))
of the Communications Act for Preemption)
of the Jurisdiction of the Virginia)
Corporation Commission Regarding)
Interconnection Disputes With Verizon)
Virginia Inc.)
)

CC Docket No. 00-251

**WORLDCOM, INC.'S OBJECTIONS
AND INITIAL RESPONSES
TO VERIZON VIRGINIA INC.'S FIFTH SET OF DISCOVERY**

Pursuant to the Procedures Established for Arbitration of Interconnection Agreements
Between Verizon and WorldCom, Cox and WorldCom, CC Docket Nos. 00-218, 00-249, 00-
251, DA 01-270, Public Notice (CCB rel. February 1, 2001), WorldCom, Inc. hereby objects as
follows to the Fifth Set of Discovery WorldCom by Verizon Virginia Inc.

SPECIFIC OBJECTIONS

- **Interrogatory V-1:** Please provide by plant account the future net salvage percentages that WorldCom uses to depreciate its plant equipment and fixed wireless equipment.

Objection: WorldCom objects to this interrogatory on the grounds that it: 1) seeks information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence; and 2) is overly broad and unduly burdensome.

Interrogatory V-2: WorldCom has announced trials of “fixed wireless” service. Please

- describe WorldCom’s plans to provide service in Virginia using fixed wireless technology in the next three years, including the date such service will be initiated.

Objection: WorldCom objects to this interrogatory on the grounds that it: 1) seeks information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence; and 2) is overly broad and unduly burdensome.

Interrogatory V-3: Please describe and identify, by location, any and all cable routes owned

- or operated by WorldCom or any of its affiliates, such as MCI Metro and Brooks Fiber.

Objection: WorldCom objects to this interrogatory on the grounds that it: 1) seeks information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence; and 2) is overly broad and unduly burdensome.

Interrogatory V-4: Please provide WorldCom's depreciation reserve percentage for the years

- 1990 through 2000.

Objection: WorldCom objects to this interrogatory on the grounds that it: 1) seeks information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence; and 2) is overly broad and unduly burdensome.

Interrogatory V-5: Does WorldCom, or any of its affiliates, offer local exchange service over

- any of its own facilities in Virginia? If so, please list all customers in Virginia to whom WorldCom, or any of its affiliates, provides local exchange service over any of its own facilities. Please provide customer name and city.

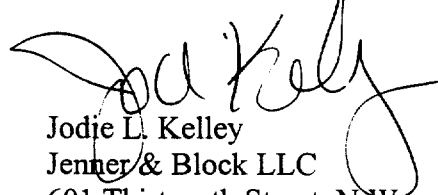
Objection: WorldCom objects to this interrogatory on the grounds that it: 1) seeks information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence; and 2) is overly broad and unduly burdensome.

Response: Subject to and without waiving the foregoing objections, WorldCom states that, it does provide local exchange service over its own facilities in Virginia.

Lisa B. Smith
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Allen Freifeld
Kimberly Wild
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Respectfully submitted,



Jodie L. Kelley
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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing "WorldCom, Inc.'s Objections and Initial Responses to Verizon Virginia Inc.'s Fifth Set of Discovery" were delivered this 20th day of July, 2001 in the manner indicated below. Copies were also served electronically on each parties' designated representatives.

Karen Zacharia
David Hall
Verizon-Virginia, Inc.
1320 North Courthouse Road, 8th Floor
Arlington, VA 22201
** By Federal Express*

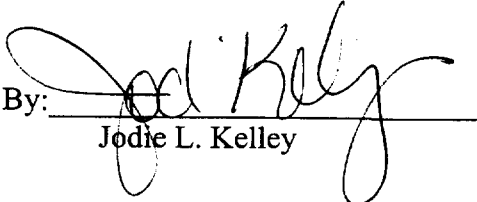
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By: 
Jodie L. Kelley